

IN THE UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION

IN THE MATTER OF THE	§	
COMPLAINT AND PETITION OF	§	4:24-CV-02568
TIMTOM LAND HOLDINGS, LLC AS	§	NOTICE OF CLAIM
OWNER OF THE MV <i>JACQUES-IMO</i> ,	§	
SHAMROCK MARINE, LLC AS	§	KSENIIA TAIGACHEV, INDIVIDUALLY
OWNER OF THE T/B SHAMROCK 500	§	AND AS REP OF THE ESTATE OF
AND BUFFALO MARINE SERVICE,	§	KONSTANTIN TAIGACHEV,
INC. AS OWNER PRO HAC VICE OF	§	DECEASED, SLIZSKAIA TATIANA
<i>SHAMROCK 500</i> IN A CAUSE OF	§	GRIGORYEVNA AND KONSTANTIN
EXONERATION FROM OR	§	TAIGACHEV KONSANTINOVICH
LIMITATION OF LIABILITY	§	

NOTICE OF CLAIM OF  
KSENIIA TAIGACHEV, INDIVIDUALLY AND AS REP OF THE ESTATE OF  
KONSTANTIN TAIGACHEV, DECEASED, SLIZSKAIA TATIANA GRIGORYEVNA AND  
KONSTANTIN TAIGACHEV KONSANTINOVICH

Subject to and without waiving his rights to pursue their claims separate from this action, Claimants Kseniia Taigachev, Individually and as Representative of the Estate of Konstantin Taigachev, Deceased, Slizskaia Tatiana Grigoryevna and Konstantin Taigachev Konsantinovich files this Claim against Complainants and would show as follows:

- (1) Claimants are residents of Russia.
- (2) Claimant is a seaman and was assigned to the vessel *The Stride*.
- (3) Complainant owned, owned pro hac vice, manned, managed, chartered, leased, operated, crewed, and/or controlled the *Stride*.
- (4) At all times relevant to this claim, the *Stride* was a U.S. flagged vessel-in-navigation, operating

(5) On or about January 8, 2024 the deceased, while working aboard the *Stride* sustained fatal injuries in a fire.

(6) Claimants have filed a lawsuit against Complainant which is filed in Harris County, Texas under Cause No. 2024-33824;

(7) In the lawsuit, Claimants allege that they are entitled to recover

- a. Past and future mental anguish;
- b. Past and future loss of companionship and society;
- c. Loss of financial support from Konstantin;
- d. Loss of inheritance;
- e. Funeral and burial expenses.

Konstantin Taigachev, deceased, suffered the following:

- a. Pain and suffering prior to death;
- b. Death; and
- c. Loss of income.

In sum, Claimants have provided Complainant and this Court with notice of his Claim in this document, and in his separately filed Answer, and requests the Court to dismiss Foss Maritime Company's Complaint and grant him all other relief to which he is justly entitled.

VB Attorneys

/s/Brian Beckcom

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Certificate of Service

A true and correct copy of the foregoing was served on all counsel of record on this 29th day of July 2024.

/s/ Brian Beckcom

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Brian Beckcom